# UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND

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SECURITIES AND EXCHANGE COMMISSION,

v.

Civil Action No. 1:16-cv-107-M

Plaintiff,

:

RHODE ISLAND COMMERCE CORPORATION:
(F/K/A RHODE ISLAND ECONOMIC:
DEVELOPMENT CORPORATION), WELLS FARGO:
SECURITIES, LLC, PETER M. CANNAVA,:
KEITH W. STOKES, and JAMES MICHAEL SAUL,:

Defendants.

# JOINT MOTION FOR ENTRY OF PROPOSED FINAL JUDGMENT AGAINST <u>DEFENDANT WELLS FARGO SECURITIES, LLC</u>

Plaintiff Securities and Exchange Commission (the "Commission") and defendant Wells Fargo Securities, LLC ("Wells Fargo") move that this Court enter the attached proposed Final Judgment as to Defendant Wells Fargo ("Final Judgment"). The Commission and Wells Fargo have agreed to all terms in the Final Judgment. In support of this motion, the parties have also filed a Consent signed by Wells Fargo, memorializing its agreement to the terms of the Final Judgment.

The parties respectfully request that the Court enter the attached proposed Final Judgment as to Defendant Wells Fargo.

Dated: March 18, 2019

Respectfully submitted,

# SECURITIES AND EXCHANGE COMMISSION, By its counsel,

#### /s/ Kathleen Shields

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WELLS FARGO SECURITIES, LLC, By its counsel,

### /s/ Luke Cadigan

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## CERTIFICATE OF SERVICE

I hereby certify that, on March 18, 2019, a true and correct copy of the foregoing document was filed through the Court's CM/ECF system, and accordingly, the document will be sent electronically to all participants registered to receive electronic notices in this case.

/s/ Kathleen B. Shields
Kathleen B. Shields